

SAMPLE #2

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA

**FILED**

NOV 06 2015

CARMELITA REEDER SHINN, CLERK  
U.S. DIST. COURT, WESTERN DIST. OKLA.  
BY W DEPUTY

**CIV-15-1243 HE**  
CASE NO. \_\_\_\_\_

*Anthony*  
Jason Robinson, an individual

Plaintiff,

vs.

Triple R. Sanitorial

Defendant.

COMPLAINT

1) Jurisdiction of the Court is invoked pursuant to USC "451, 1331, 1337, 1343 and 1345. This action is authorized and instituted pursuant to 1706(f)(3) of the Civil Rights Act of 1964, as amended, Title VII, 42 USC 2000(e)(5)(f)(3), and 1102 of the Civil Rights Act of 1991, 42 USC 1981(a).

2. The employment practices alleged to be unlawful were committed within the jurisdiction of the United States District Court for the Western District of Oklahoma.

3. Jason Anthony Robinson is a resident of the Western District of Oklahoma.

4. Defendant Triple R. Sanitorial is an Oklahoma Corporation doing business in the State of Oklahoma.

NOTE: Your signature, address and phone number must appear at the end of each pleading.

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5. At all relevant times, Defendant has been and is now doing business in the state of Oklahoma and has continuously employed over (20) employees.

### Race Discrimination and Pay Discrimination

6. Plaintiff hereby re-alleges and re-incorporates each and every allegation contained in paragraphs 1- through 5 above.

7. Plaintiff began employment with Defendant in Aug 1, 2014. Plaintiff was ~~notified~~ suspended on May 27, <sup>2014</sup> for 1 day for unknown reasons. Plaintiff is African American.

8. Plaintiff was terminated on May 28 2014 for unknown reason. Plaintiff was given lead responsibilities with no pay for lead positions. White male came months after Jason Robinson and was immediately made a lead with same responsibilities with higher pay.

9. Female lead positions were paid higher with no <sup>male</sup> African ~~American~~ American with lead positions, resulting in intentional disparate treatment of male African Americans.

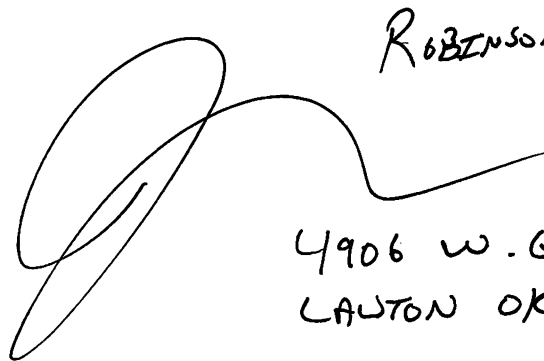
10. Plaintiff filed his charge of discrimination with the Equal Employment Opportunity Commission on 8 June 2015. and received his notice of right to sue after investigation couldn't be completed within two weeks.

11. As a result of Defendant's actions, ~~Plaintiff's~~ Plaintiff has suffered damages in emotional distress, financial distress, mental distress, including compensatory damages and statutory damages.

12. Plaintiff hereby re-alleges and re-incorporates each and every allegations contained in paragraphs ~~1~~ 1 through 11 above.

13 Defendant intentionally discriminated against Plaintiff based upon his race. As a result, Plaintiff has suffered damages and he asks this Court to impose punitive damages setting an example and deterring future misconduct

Wherefore, Plaintiff prays this Court enter judgement upon this Complaint in his favor and against Defendant, including <sup>damages</sup> attorney fees, costs and any and all other relief this Court deems just.



ROBINSON, JASON

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